

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

George L and Robin C Kix
Debtor(s)

v.

William C. Miller Standing Chapter 13 Trustee,
Creditor

In Re:
George L and Robin C Kix

Case No.: 17-14162-MDC

Judge: MDC

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

☐ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

☒ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following
(choose one):

1. ☐ Motion for Relief from the Automatic Stay filed by
_____, creditor.
A hearing has been scheduled for _____, at _____.

OR

- ☒ Motion to Dismiss filed by the Standing Chapter 13 Trustee.
A hearing has been scheduled for May 24, 2018, at 9:30 AM.

- ☐ Certification of Default filed by creditor,
I am requesting a hearing be scheduled on this matter.

OR

- ☐ Certification of Default filed by Standing Chapter 13 Trustee
I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons **(choose one):**

☐ Payments have been made in the amount of \$____, but have not been accounted for. Documentation in support is attached hereto.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**): _____

☒ Other (**explain your answer**): We will file a modify plan to address mortgage arrears since, debtors received a loan modification.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: May 11, 2018

/s/George L and Robin C Kix
Debtor's Signature